

RECOMMENDATIONS

Three recommendations for the Loess Hills landform region are presented below. These include a recommendation for management of the Loess Hills, and two additional studies, an ethnographic study, and a landmark study.

1. Recommended Management Alternative: Alternative 5

The National Park Service concludes that the most effective and efficient approach to protecting the significant resources of the Loess Hills landform region, and providing opportunities for appropriate public enjoyment, is a combination of the management alternatives previously presented in this study. This combination includes a step-up plan consisting of local collaboration, the formation of a Joint Powers Board, the development of a Comprehensive Plan, and finally, the potential designation as a National Reserve, an affiliated area of the National Park Service. Affiliated areas are neither owned nor directly managed by the National Park Service, yet are eligible to receive technical assistance from the NPS.

The NPS evaluated the challenges and opportunities for management of the Loess Hills. The value of developing strong, locally based support and commitment to preserving the Loess Hills landform region was apparent. The NPS also recognizes the numerous federal, state, and local efforts currently underway to protect the resource values of the Loess Hills. By providing support to these efforts, the National Park Service can help to ensure that the significant resources of the Loess Hills are perpetuated for generations to come. This management strategy provides a framework that originates at the local level, and allows for state and federal assistance. This recommendation:

- Recognizes the national significance of the Loess Hills landform region.
- Encourages and enables local units of government to develop measures to protect the resources of the Loess Hills.
- Provides for Federal participation in protection of the Loess Hills at a level of involvement supported by local units of government and citizens of the region.
- Provides for recognition and technical assistance beyond what is currently available through existing National Park Service programs.

Under this three-phased strategy, Congress would pass legislation for the Loess Hills that encourages the state of Iowa or the counties within the Loess Hills to form a Joint Powers Board (JPB) to develop a Comprehensive Plan within a specified period. Such legislation would authorize and provide funding for the National Park Service to participate as a partner in the development of a Comprehensive Plan to ensure long-term protection of the Hills. The legislation also would outline a mechanism whereby the JPB and the Governor of Iowa could

petition the Secretary of Interior to designate the National Reserve, as authorized in the Loess Hills legislation.

Specifically, the three phases of this recommendation include:

Phase I: Joint Powers Board (JPB) Formation

The state of Iowa or the counties would form a JPB for the purpose of developing a Comprehensive Plan to ensure long-term protection of the Hills. At a minimum, this board would consist of a quorum of at least four of the seven counties of the Loess Hills landform region. The board would be structured in a manner that provides for participation of interested municipalities, the Iowa Department of Natural Resources, the National Park Service, and interested tribes (Otoe-Missouria, Iowa, Winnebago, and others) as non-voting, technical advisors. When and if this board is created, then Phase II may be implemented.

Phase II: Comprehensive Planning

During this phase, the JPB would initiate the development of a Comprehensive Plan for the Loess Hills. The National Park Service would be authorized and funded to provide technical assistance to the JPB in the development of the Comprehensive Plan and associated Environmental Impact Statement (EIS). The EIS would evaluate impacts of alternatives for protection of the Hills as described, including, at the board's discretion, an alternative focused on creation of a National Reserve.

The Comprehensive Plan would address all of the following:

- Resource inventories/visual assessments to identify important natural, scenic, historic and cultural assets.
- Measures to ensure that the significant resources of the Loess Hills landform region receive long-term protection.
- Measures to ensure that development in the region is sensitive to the resources, American Indian interests, and respects local character.
- Measures to ensure continued enjoyment of the Loess Hills by visitors and residents alike.
- The identification of a permanent management entity (JPB or otherwise) responsible for encouraging, monitoring, and enforcing implementation of the plan.
- If the JPB chose to include an alternative focused on creation of a National Reserve, then the National Park Service would review the Comprehensive Plan to ensure that measures for protecting the resources and for providing visitor enjoyment are consistent with NPS policies.

The JPB would recommend the geographic scope of the Reserve (including specific boundary descriptions). The Reserve could include the entire landform region or portions of the landform region, provided it is demonstrated that each portion(s) meet the standards for significance as identified in the National Park Service *Management Policies* (2001). The NPS would also evaluate the plan to ensure that the geographic scope adequately represents

the nationally significant landform region. Shortcomings in the Comprehensive Plan would be returned to the JPB for revision. Upon completion of the plan and EIS, and after NPS review and approval, the JPB could opt to formally recommend designation of the National Reserve to the Governor of Iowa.

Phase III: Designation of Loess Hills National Reserve

During this phase, steps would be taken to designate the qualifying portions of the area as a National Reserve. The Governor of Iowa would request the Secretary of the Interior approve designation of the Loess Hills National Reserve and sanction the management entity recommended in the plan. Upon approval of the Secretary, the National Reserve would become an affiliated area of the National Park System. The Reserve would be managed by the sanctioned management entity. As an affiliated area of the National Park System, the Reserve would be included in NPS publications and brochures. There would not be federal land acquisition within the Loess Hills National Reserve.

The NPS could ensure the consistency of federal actions throughout the area covered by the national designation. If authorized by Congress, the NPS would review federal undertakings in the area to ensure that said undertakings were in keeping with the purposes for which the Reserve was established, and that are consistent with the Reserve's Comprehensive Plan. The NPS would work with other federal agencies entities to modify proposed undertakings found to be incompatible with the Reserve's Comprehensive Plan so that they would conform to the Plan.

2. Recommended Ethnographic Study

Several tribal groups have lived, hunted, or led forays into the Loess Hills in historic times. A large land tract encompassing all of the Loess Hills in Iowa was ceded by several tribes that signed the Treaty of Prairie du Chien on July 15, 1830. These included the Ioway, Oto, Missouri, Omaha, and Sac and Fox peoples, as well as the Wahpekute, Wahpeton, and Sisseton divisions of the Dakota (Royce 1899). Through testimony presented to the Indian Claims Commission during the 1950s and 1960s, the federal government recognized that the Ioway, Oto, Omaha, and Sac and Fox peoples hunted or otherwise used the Loess Hills. The Commission rendered formal judgments that awarded these groups further payment for the 1830 cession of the Loess Hills and surrounding region in Iowa (Indian Claims Commission 1978 with respect to Dockets 11, 11-A, and 138). The Potawatomi, a group originally from near Lake Michigan, were settled in the central and southern portions of the Loess Hills by the federal government in the 1830s and remained there for approximately a decade before being removed to a reservation outside of Iowa (Clifton 1978, 1998; Edmunds 1978). Undoubtedly other Native American tribal groups used the hills for various purposes as well, likely including the Ponca, Yankton, and other Dakota people.

Additional research is needed to expand our understanding of these peoples' presence in the Loess Hills. A cultural affiliation study would document the historic associations of native

peoples with the Loess Hills and surrounding region via detailed review and analysis of ethnographic and historical literature, including the testimony offered in land claims cases before the Indian Claims Commission. A cultural properties survey would identify places in the Loess Hills that are important to the cultural identity, traditional cultural practices, and traditional religious beliefs of native peoples who have an historical association with the Loess Hills by way of literature reviews and interviews with tribal members. Both of these studies would provide specific information regarding traditional cultural properties and Native American concerns that are essential for comprehensive land-management planning.

3. Recommended Landmark Evaluations

As mentioned earlier in the resource evaluation section of the study, the NPS believes the Jones Creek Watershed and the Glenwood Locality warrant additional research into their national significance. Additionally, the NPS recommends the identified 12 Special Landscape Areas be studied for consideration as National Natural Landmarks (NNL). Appendix D contains greater descriptions of the Special Landscape Areas.

